

August 15, 2016

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue SE.
Washington, DC 20590



RE: Docket No. FHWA-2016-0016

Dear Sir or Madam;

As Chairman of the Montachusett Regional Planning Commission (MRPC) and as a signatory to the Montachusett Metropolitan Planning Organization (MMPO), I would like to offer the following comments regarding Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) MPO Coordination and Planning Area Reform Notice of Proposed Rulemaking (NPRM) released on June 27, 2016 in the Federal Register.

The MRPC, which serves as staff to the Montachusett MPO, encompasses 22 communities in north central Massachusetts with a diverse population of approximately 230,000 individuals. Over the last several years, the overall role, function and coordination of the MMPO has significantly improved for the better. What was once a somewhat cumbersome process has evolved into a more transparent and equitable process that can respond more effectively to local concerns and issues. The NPRM appears to run counter to these gains by attempting to address an issue that really does not exist here in Massachusetts. The NPRM if implemented will result in significant changes to our MPO either through re-designation, merger or loss of local control. Several communities that have taken on an active role in the MMPO will, through this NPRM, likely be bound to the Boston Urbanized Area (UZA) severely affecting their ability to participate in the transportation planning process.

In addition, recent improvements in public outreach and equity implemented by the MPO through the work efforts of the MRPC will also be adversely impacted by this NPRM. What is now a manageable and responsive process will become cumbersome and less responsive as the size of these newly defined MPOs expand and grow. In our experience, larger is not always better. Smaller defined MPOs consisting of like-minded communities based on similar issues and problems results in a better and more diverse planning process.

As mentioned, the MMPO has developed a strong and active process with our member communities through outreach and one on one interaction. The current structure and planning area allow for effective coordination and responsiveness to the needs of the municipalities. This rule if implemented would adversely impact the positive gains made in our region in the transportation planning process by removing this local control and involvement.

This NPRM also runs contradictory to past efforts from the federal government to improve and address equity issues among the MPO populations. By reshaping the MPO into larger more complex planning areas as outlined in the NPRM, that accessibility and accountability will be lost and local involvement will be dramatically curtailed.

The NPRM will significantly impact our Regional Planning Commission and MPO and our ability to effectively work with and for our member communities as well as adversely affect equity and the local planning process. The NPRM appears to attempt to address an issue that is really not prevalent in our region or state. Because of these issues, the MRPC and its members request that the proposed rulemaking and its potential implementation as currently defined be reconsidered and that any efforts to improve the MPO process be focused on enhancing local input and decision making.

Thank you for the opportunity to comment on this important NPRM.

Sincerely,

John Telepciak

John Telepciak
Chair
Montachusett Regional Planning Commission

Cc: David Mohler, OTP, MassDOT
Michael Chong, FHWA